

FILED

September 14, 2022

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 DEL RIO DIVISION

CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 By: CR
 Deputy

DR:22-CR-02060-AM

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|--------------------------|---|---|
| UNITED STATES OF AMERICA | § | CAUSE NO.: |
| | § | |
| | § | <u>INDICTMENT</u> |
| v. | § | |
| | § | [VIO: COUNT ONE: 8 U.S.C. § |
| | § | 1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy |
| KAYLA JEANILA WILLIAMS | § | to Transport Illegal Aliens.] |

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about August 15, 2022, in the Western District of Texas, Defendant,

KAYLA JEANILA WILLIAMS,

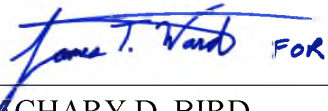
did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

A TRUE BILL



FOREPERSON

ASHLEY C. HOFF
United States Attorney

By:  FOR
ZACHARY D. BIRD
Assistant United States Attorney